

HOGAN & HARTSON
L.L.P.

MICHELE C. FARQUHAR

DIRECT DIAL
(202) 637-5663

COLUMBIA SQUARE
555 THIRTEENTH STREET, N.W.
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910
WWW.HHLAW.COM

May 2, 2005

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D. C. 20554

Re: CC Docket No. 94-102
Notice of *Ex Parte* Presentations

Dear Ms. Dortch:

This is to inform you that Gene DeJordy, Vice President of Regulatory Affairs, Western Wireless Corporation, and I participated in two *ex parte* meetings on April 28, 2005 regarding Western Wireless' E911 Phase II deployment efforts. We met with Wireless Telecommunications Bureau representatives Cathy Seidel, Nicole McGinnis, Michael Wilhelm, Jeff Cohen, and Dave Siehl, and we (along with Mark Rubin, Western Wireless' Director of Federal Government Affairs) briefly visited with Sam Feder in Chairman Kevin Martin's office.

During these meetings, Western Wireless highlighted the substantial progress it has made in transitioning its customers from non-AGPS handsets to Phase II compliant AGPS handsets. Likewise, we noted that Western Wireless has consistently met the FCC's E911 obligations for handset activations as well as Phase I and Phase II deployment, despite its predominantly rural coverage area (with an average population density of just 11 people per square mile). Nevertheless, Western Wireless' rural customers still highly value their existing non-AGPS handsets (analog and digital), so migrating these customers to meet the FCC's 95% handset penetration requirement will be a considerable challenge. Western Wireless described its company-wide commitment and the significant initiatives it has launched to meet the December 31, 2005 deadline, including special promotions and advertising for AGPS-capable handsets, purging non-AGPS phones from its "loaner pool" and from its sales commission programs, and other internal policies and enforcement efforts. Finally, Western Wireless also distributed a map of its Phase II deployment status (attached), which reflects the

Ms. Marlene H. Dortch

May 2, 2005

Page 2

few PSAPs in its large rural coverage area that have requested Phase II service, and noted its ongoing efforts to work with the public safety and PSAP community.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing this notice electronically in the above-referenced docket. In addition, I am sending one copy of this notice to each of the FCC representatives listed below. Please contact me directly with any additional questions.

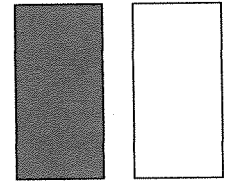
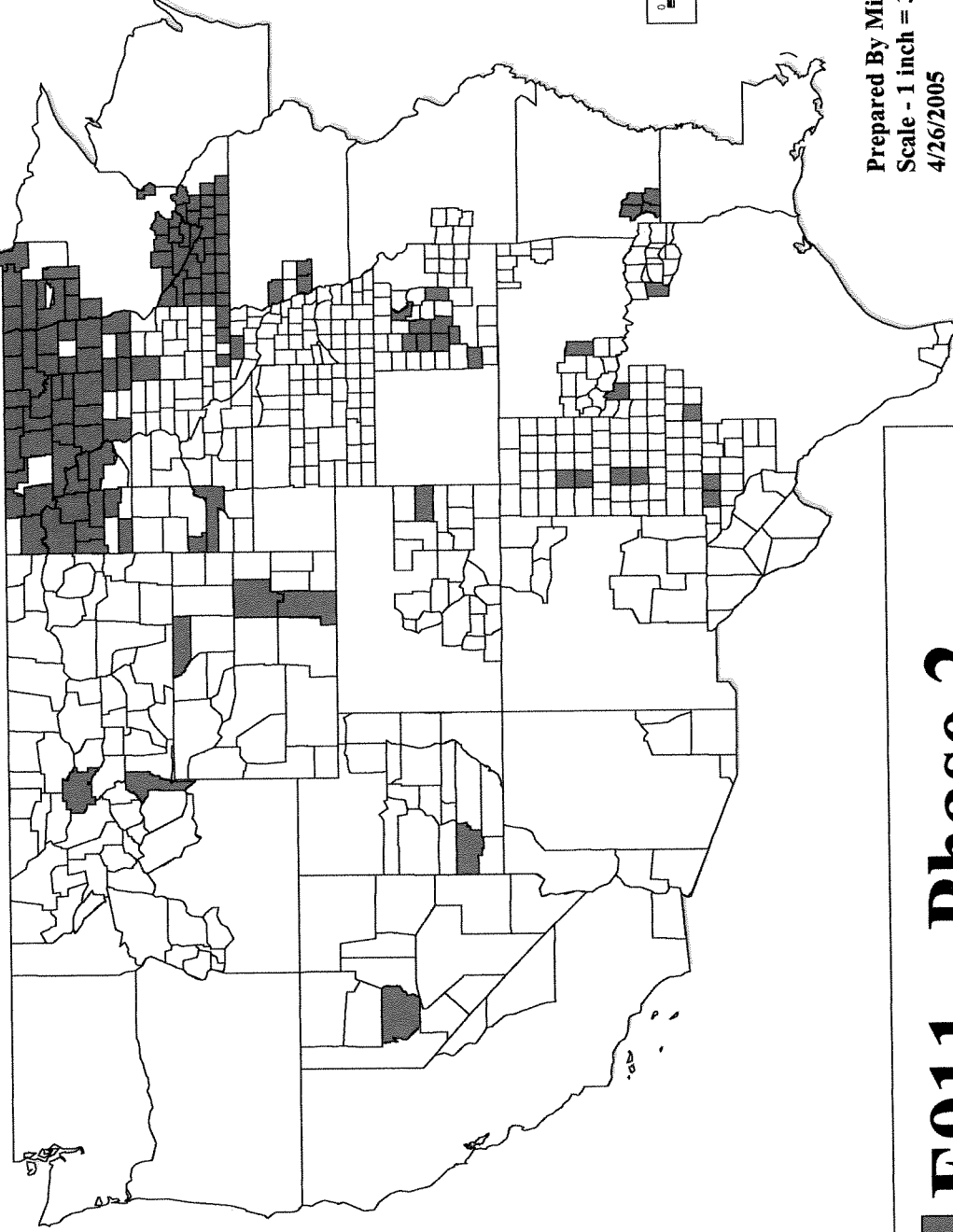
Respectfully submitted,

/s/ Michele C. Farquhar

Michele C. Farquhar
Counsel to Western Wireless Corporation

cc: Sam Feder
Cathy Seidel
Nicole McGinnis
Michael Wilhelm
Jeff Cohen
Dave Siehl

WWC E911 Counties - Phase 2 Status



Prepared By Michael McInnis
Scale - 1 inch = 300 Miles
4/26/2005